

**Drawings:**

The attached Replacement Sheets 1-10 of formal drawings do not include any changes to FIGS. 1-22. These new drawings replace the previously informal drawings, FIGS. 1-22 which were filed with the referenced application on February 19, 2004.

Attachment: Replacements Sheets 1-10 (FIGS. 1-22)

### **Remarks**

This is in response to the first Office Action mailed March 21, 2005, which rejected originally presented claims 1-10, 12-27, and indicated that dependent claim 11 would be allowable if rewritten into independent form. No claim amendments have been presented at this time.

### **Drawings**

The Applicant has provided herewith 10 Replacement Sheets of drawings to replace the 10 sheets of informal drawings which were filed with the referenced application on February 19, 2004. These Replacement Sheets of drawings do not include any amendments or changes to FIGS. 1-22 (sheets 1-10).

### **Rejection of Claims Under 35 U.S.C. §102(b)**

Claims 1-10, 12-14 and 16-27 were rejected as being anticipated by U.S. Patent No. 3,786,559 issued to Smith ("Smith '559"). This rejection is respectfully traversed.

Of the rejected claims, claims 1, 16 and 24 are independent claims. Because of the formats of these respective claims, the following discussion will review these claims out of order, beginning with claim 16.

#### **1. Rejection of Independent Claim 16**

The Applicant respectfully submits that Smith '559 at least fails to disclose "a first *cantilevered spring contact* affixed to and which projects from a selected one of the *proximal and distal ends* of the [recited] pin," as featured by independent claim 16.

In support of the rejection, the Examiner identified pins 20 or 25 as corresponding to the recited pin of claim 16. These respective pins 20, 25 are best viewed in FIGS. 3 and 4 of Smith '559, with the pin 20 forming a portion of a "d.c. feedthrough 17" and the pin 25 forming a portion of an "r.f. feedthrough 21." See Smith '559, col. 3, lines 51-57 and lines 58-68. For reference, two of these d.c. feedthroughs 17 are depicted in FIG. 1 of Smith '559.

The Examiner further identified cantilevered spring contacts 30, 31 of Smith '559 as corresponding to the recited "first cantilevered spring contact" of claim 16. The problem with this characterization, however, is that the spring contacts 30, 31 of Smith '559 mate with *studs 15*, not the pins 20, 25. See e.g., Smith '559, FIG. 1; col. 4, lines 36-43 and lines 59-60.

Unlike the electrical feedthrough conductors 20, 25, Smith '559 describes the studs 15 as being electrically connected to the plate 11; more particularly, the studs 15 are inserted into apertures 12 and are provided with seating flanges 16 so as to partially extend through the thickness of the plate. See Smith '559, FIG. 1; col. 3, lines 23-27 and lines 45-49; col. 4, lines 1-16. The studs 15 are described as serving to secure the carriers 29 to the plate 11, as well as to provide a grounding path from the carriers to the plate. See Smith '559, col. 4, lines 36-43 and lines 53-55.

Accordingly, the Applicant respectfully submits that Smith '559 fails to disclose the subject matter of independent claim 16, and therefore requests reconsideration and withdrawal of the rejection of claim 16, as well as for the claims depending therefrom.

## 2. Rejection of Independent Claim 24

Independent claim 24 recites, *inter alia*, “a corresponding *plurality of first cantilevered spring contacts* each of which projects from a selected one of the proximal and distal ends of each *of the plurality of pins*.” The Applicant respectfully submits that the foregoing deficiencies of Smith ‘559 discussed above are equally applicable here, so that the rejection of independent claim 24, and the claims depending therefrom, are improper as well.

The Applicant further points out that Smith ‘559 is additionally deficient with regard to “an insertion member comprising a plate with a plurality of spaced apart apertures formed therethrough, the insertion member *configured for attachment adjacent an aperture* in a first housing member,” as featured by independent claim 24. Reconsideration and withdrawal of the rejection of claim 24, and for the claims depending therefrom, are thus requested on this basis as well.

## 3. Rejection of Independent Claim 1

Independent claim 1 is a combination claim that recites “means for establishing individual electrical conduction paths through the first housing member.”

Claim 1 is drafted in accordance with 35 U.S.C. §112, sixth paragraph, so that the recited “means” element is construed in accordance with the corresponding structure disclosed in the specification identified as carrying out the recited function, and equivalents thereof. See 35 U.S.C. §112, sixth paragraph; *In re Donaldson Co. Inc.*, 29 USPQ2d 1845 (Fed. Cir. 1994)(*en banc*); MPEP §2181 et. seq.; *Supplemental Examination Guidelines for Determining the Applicability of 35 U.S.C. Section 112 Para. 6*, 65 Federal Register 38510

(June 2000)(administrative procedures promulgated by the Director in accordance with the APA).

The Applicant discloses the corresponding structure for the “means” element at page 13, line 32 to page 14, line 6 of the present application as including both a rigid pin (such as 202) and a cantilevered leaf spring (such as 206). The PTO is thus obliged as a matter of law to utilize this construction for the “means” element. See *Donaldson, Supra; B. Braun Medical v. Abbott Lab.*, 43 USPQ2d 1896, 1900 (Fed. Cir. 1997)(structure disclosed in the specification is ‘corresponding’ structure if the specification or prosecution history *clearly links or associates that structure* to the function recited in the claim.)

Accordingly, when the “means” element of claim 1 is properly construed, from the foregoing discussion it can be readily seen that Smith ‘559 fails to anticipate the claimed subject matter of claim 1 as well. Reconsideration and withdrawal of the rejection of claim 1, and for the claims depending therefrom, are therefore respectfully requested.

#### **Rejection of Claim 15 Under 35 U.S.C. §103(a)**

Dependent claim 15 was rejected as being obvious over Smith ‘559 in view of U.S. Patent No. 5,193,046 issued to Lemke et al. (“Lemke ‘046”). This rejection is respectfully traversed.

Lemke ‘046 provides nothing of significance to make up for the deficiencies of Smith ‘559 as discussed above. Accordingly, reconsideration and withdrawal of the rejection of claim 15 are respectfully requested on the basis that claim 15 depends from a base claim that is believed patentable for the foregoing reasons.

### **Indication of Allowable Subject Matter**

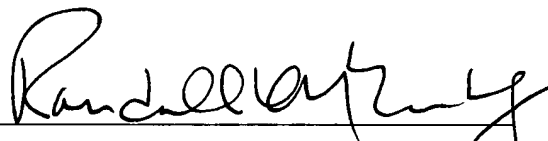
The Applicant gratefully acknowledges the indication of allowability of dependent claim 11. However, the Applicant has elected to not rewrite claim 11 into independent form on the basis that the base claim from which claim 11 depends is believed to be patentable for the foregoing reasons.

### **Conclusion**

The Applicant respectfully requests reconsideration and allowance of all of the claims pending in the application. This Response is intended to be a complete response to the Office Action mailed March 21, 2005.

Should any questions arise concerning this response, the Examiner is invited to contact the below signed Attorney.

Respectfully submitted,

By: 

Randall K. McCarthy, Registration No. 39,297  
Mitchell K. McCarthy, Registration No. 38,794  
Fellers, Snider, Blankenship, Bailey and Tippens  
100 N. Broadway, Suite 1700  
Oklahoma City, Oklahoma 73102  
Telephone: (405) 232-0621  
Facsimile: (405) 232-9659  
Customer No. 33900